

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE SUBPOENA TO
JIMMY NGUYEN

Case No. 2:20-cv-00593-BJR

IRA KLEIMAN, as the personal
representative of the Estate of David
Kleiman, and W&K Info Defense Research,
LLC,

Plaintiffs,

v.

CRAIG WRIGHT,

Defendant.

**SECOND DECLARATION OF
VELVEL (DEVIN) FREEDMAN IN
SUPPORT OF PLAINTIFFS' SECOND
MOTION TO COMPEL**

DECLARATION

1. I am an attorney for Plaintiffs Ira Kleiman, as the personal representative of the Estate of David Kleiman, and W&K Info Defense Research, LLC (collectively, "Plaintiffs"). I am admitted to practice in the U.S. Supreme Court, Florida, District of Columbia, U.S. Courts of Appeals for the Ninth and Eleventh Circuits, and all U.S. District Courts in Florida.

2. I am over the age of eighteen. The statements in this declaration are based on my personal knowledge and they are true and accurate to the best of my knowledge and belief. I make this declaration in support of Plaintiffs' Second Motion to Compel.

3. On April 30, 2020, I deposed Mr. Nguyen. That deposition lasted for 5 hours and 32 minutes on the record.

4. Attached hereto as Exhibit 1 is an email that I received from Dr. Wright's attorney on May 1, 2020. Mr. Nguyen's attorneys were copied on this email.

5. Attached hereto as Exhibit 2 is a true and correct copy of Order on Plaintiffs' Motion to Compel, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Aug. 27, 2019), ECF No. 277.

6. Attached hereto as Exhibit 3 is a true and correct copy of Order on Discovery, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Mar. 9, 2020), ECF No. 420.

7. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt from Reply to Defence, *Craig Wright v. Peter McCormack*, Claim No. QB-2019-001430 (EWHC (QB) Oct. 11, 2019).

8. Attached hereto as Exhibit 5 is a true and correct copy of an excerpt from Amended Particulars of Claim, *Craig Wright v. Peter McCormack*, Claim No. QB-2019-001430 (EWHC (QB) Dec. 19, 2019).

1 I declare the foregoing statements to be true under the penalties of perjury.
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3 Dated: May 8, 2020

4 /s/ Velvel (Devin) Freedman
Velvel (Devin) Freedman, Esq.
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SECOND DECLARATION OF FREEDMAN
(Case No. 2:20-cv-00593-BJR)

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/s/ Emanuel Jacobowitz
Emanuel Jacobowitz, WSBA #39991